

David B. Picker, Esquire [DP-9658]
 SPECTOR GADON & ROSEN, P.C.
 1635 Market Street, 7th Floor
 Philadelphia, PA 19103
 (215) 241-8888 / FAX- (215) 241-8844
Lead Counsel For Plaintiffs

Edward Finkelstein, Esquire [EF-2805]
 TARTER, KRINSKY & DROGIN P.C.
 1350 Broadway
 New York, New York 10018
 Tel: 212-216-8000 / FAX- 212-216-8001
Local Counsel For Plaintiffs

**UNITED STATES DISTRICT COURT
 SOUTHERN DISTRICT OF NEW YORK**

DREAMLAND AMUSEMENTS, INC.,	:	
TOY CIRCUS , INC., CROSSROADS	:	
TRUCKING CORP., ROBERT DESTEFANO,	:	
and KATHRYN DESTEFANO,	:	
 Plaintiffs,		
 v.		
 THE HONORABLE ANDREW M. CUOMO,		
ATTORNEY GENERAL OF THE STATE OF		
NEW YORK, OFFICE OF ATTORNEY		
GENERAL		
 Defendant.		

Case No. 08-CIV-6321(JGK)

**MOTION FOR
PRO HAC VICE ADMISSION**

PLEASE TAKE NOTICE that, upon the Declaration of David B. Picker, dated July 14, 2008, the Declaration of Heather M. Eichenbaum, dated July 14, 2008 and the Exhibits attached thereto, the undersigned hereby moves this Court, pursuant to Local Civil Rule 1.3(c), for an Order admitting Heather M. Eichenbaum *pro hac vice*, for purposes of representing Plaintiffs, Dreamland Amusements, Inc., Toy Circus, Inc., Crossroads Trucking Corp., Robert DeStefano and Kathryn DeStefano ("Plaintiffs") for all purposes in this action.

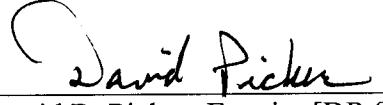
Applicant's Name: Heather M. Eichenbaum
Firm Name: Spector Gadon & Rosen, P.C.
Address: 1635 Market Street, 7th Floor, Philadelphia, PA 19103
Phone No.: 215-241-8856
Fax No.: 215-531-9129
Email: heichenbaum@lawsgr.com

Date: July 14, 2008
Philadelphia, PA

Respectfully submitted,

SPECTOR GADON & ROSEN, PC

By:



David B. Picker, Esquire [DP-9658]
1635 Market Street, 7th Floor
Philadelphia, PA 19103
215-241-8888 / FAX- 215-241-8844

Edward Finkelstein, Esquire [EP-2805]
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Local Counsel For Plaintiffs

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

DREAMLAND AMUSEMENTS, INC.,	:	
TOY CIRCUS , INC., CROSSROADS	:	
TRUCKING CORP., ROBERT DESTEFANO,	:	
and KATHRYN DESTEFANO,	:	
Plaintiffs,	:	Case No. 08-CIV-6321(JGK)
v.	:	
THE HONORABLE ANDREW M. CUOMO,	:	
ATTORNEY GENERAL OF THE STATE OF	:	
NEW YORK, OFFICE OF THE ATTORNEY	:	
GENERAL,	:	
Defendant.	:	

Upon the Motion of David B. Picker, attorney for Plaintiffs, Dreamland Amusements, Inc., Toy Circus, Inc., Crossroads Trucking Corp., Robert DeStefano, and Kathryn DeStefano ("Plaintiffs"), the supporting Declaration of David B. Picker, and the Declaration of Heather M. Eichenbaum and the Exhibits attached thereto;

IT IS HEREBY ORDERED that

Applicant's Name: Heather M. Eichenbaum
 Firm Name: Spector Gadon & Rosen, P.C.
 Address: 1635 Market Street, 7th Floor, Philadelphia, PA 19103
 Phone No.: 215-241-8856
 Fax No.: 215-531-9129
 Email: heichenbaum@lawsgr.com

is admitted to practice *pro hac vice* as counsel for Plaintiffs in the above captioned case in this Court. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the

Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at www.nysd.uscourts.gov. Counsel shall forward the *pro hac vice* fee to the Clerk of Court.

Date: _____, 2008
New York, New York

_____, U.S.D.J.

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Local Counsel For Plaintiffs

**UNITED STATES DISTRICT COURT
 SOUTHERN DISTRICT OF NEW YORK**

DREAMLAND AMUSEMENTS, INC., TOY CIRCUS , INC., CROSSROADS TRUCKING CORP., ROBERT DESTEFANO, and KATHRYN DESTEFANO,	: : : :	Case No. 08-CIV-6321(JGK)
Plaintiffs,	: : : :	DECLARATION OF DAVID B. PICKER IN SUPPORT OF MOTION FOR ADMISSION <u>PRO HAC VICE</u>
v.	: : : :	

THE HONORABLE ANDREW M. CUOMO, ATTORNEY GENERAL OF THE STATE OF NEW YORK, OFFICE OF THE ATTORNEY GENERAL,	: : : :
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Defendant.	:
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COMMONWEALTH OF PENNSYLVANIA	: : ss.: :
COUNTY OF PHILADELPHIA	:

DAVID B. PICKER, pursuant to 28 U.S.C. §1746, declares and affirms as follows:

1. I am an attorney associated with the firm of Spector Gadon & Rosen, P.C. I am duly licensed to practice law in the State of New York, having been admitted to the Bar of New York on September 18, 1981. I am also a member in good standing of the Bar of this Court,

having been admitted to practice before the Southern and Eastern Districts of New York on December 14, 1982.

2. I submit this declaration in support of the admission to this Court *pro hac vice* of Heather M. Eichenbaum, pursuant to Local Rule 1.3(c), to help represent Plaintiffs, Dreamland Amusements, Inc., Toy Circus, Inc., Crossroads Trucking Corp., Robert DeStefano, and Kathryn DeStefano ("Plaintiffs") in this litigation.

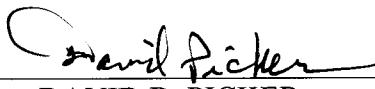
3. Ms. Eichenbaum is a member in good standing of the Bars of Pennsylvania and New Jersey, as well as the United States District Courts for the Eastern and Middle Districts of Pennsylvania, the District of New Jersey, the Southern District of Indiana, and the United States Court of Appeals for the Third Circuit. She has not been subjected to any order of suspension or disbarment.

4. I have known and worked with Ms. Eichenbaum since 1997. During that time, I have found her to be an attorney of high professional skill and integrity. She is experienced in federal practice and the Federal Rules of Civil Procedure.

5. Wherefore, I respectfully request that Ms. Eichenbaum be admitted *pro hac vice* to represent Plaintiffs in this action, together with myself and Edward Finkelstein, Esquire of the law firm Tarter, Krinsky & Drogin.

6. I declare under penalties of perjury that the foregoing is true and correct.

Date: July 14, 2008
Philadelphia, PA



DAVID B. PICKER

David B. Picker, Esquire [DP-9658]
 SPECTOR GADON & ROSEN, P.C.
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**UNITED STATES DISTRICT COURT
 SOUTHERN DISTRICT OF NEW YORK**

DREAMLAND AMUSEMENTS, INC.,	:	
TOY CIRCUS , INC., CROSSROADS	:	
TRUCKING CORP., ROBERT DESTEFANO,	:	
and KATHRYN DESTEFANO,	:	
Plaintiffs,	:	Case No. 08-CIV-6321(JGK)
v.	:	
THE HONORABLE ANDREW M. CUOMO,	:	DECLARATION IN
ATTORNEY GENERAL OF THE STATE OF	:	SUPPORT OF MOTION FOR
NEW YORK, OFFICE OF THE ATTORNEY	:	<u>ADMISSION PRO HAC VICE</u>
GENERAL,	:	
Defendant.	:	
COMMONWEALTH OF PENNSYLVANIA	:	
COUNTY OF PHILADELPHIA	:	: ss.:

HEATHER M. EICHENBAUM, pursuant to 28 U.S.C. §1746, declares and affirms as follows:

1. I am an attorney and member of the firm of Spector Gadon & Rosen, P.C., with offices located at 1635 Market Street, 7th Floor, Philadelphia, Pennsylvania 19103, Tel.- (215)

241-8888, and Fax- (215) 241-8844. My direct telephone number is (215) 241-8856 and my direct facsimile number is (215) 531-9129.

2. I submit this declaration in support of the motion for my admission to this Court *pro hac vice*, pursuant to Local Rule 1.3(c), to represent Plaintiffs, Dreamland Amusements, Inc., Toy Circus, Inc., Crossroads Trucking Corp., Robert DeStefano, and Kathryn DeStefano (“Plaintiffs”) in connection with this litigation.

3. I was admitted to practice law in both the Commonwealth of Pennsylvania and the State of New Jersey in 1996. I am also admitted to practice in the United States District Courts for the Eastern and Middle Districts of Pennsylvania, the District of New Jersey, the Southern District of Indiana, as well as the United States Court of Appeals for the Third Circuit. I have also been admitted *pro hac vice* in the Circuit Court of the Sixth Judicial Circuit of the State of Florida (Pinnellas County) several times in recent years, and the United States District Court for the Southern District of Florida.

4. I am a member in good standing in each of these jurisdictions. Attached hereto as Exhibit “A” are recent certificates of good standing from the Commonwealth of Pennsylvania and the State of New Jersey.

5. I am not currently and have never been suspended or disbarred in any jurisdiction, and there are no disciplinary matters pending against me.

6. Plaintiffs have been clients of mine for several years, and want me to appear for and help represent them in this lawsuit as I am intimately familiar with the industry in which they operate, lending specific knowledge to the particularized issues involved herein.

7. Wherefore, I respectfully request that I be admitted *pro hac vice* to represent Plaintiffs in this action, together with David B. Picker, Esquire, of the law firm of Spector

Gadon & Rosen, P.C. and Edward Finkelstein, Esquire of the law firm Tarter, Krinsky & Drogin, both of whom are members in good standing of the bar of this Court.

6. I declare under penalties of perjury that the foregoing is true and correct.

Date: July 14, 2008
Philadelphia, PA



HEATHER M. EICHENBAUM

Exhibit “A”



Supreme Court of Pennsylvania

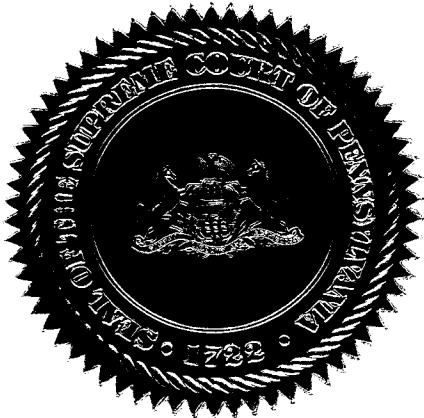
CERTIFICATE OF GOOD STANDING

Heather M. Eichenbaum, Esq.

DATE OF ADMISSION

December 11, 1996

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



Witness my hand and official seal

Dated: July 11, 2008

A handwritten signature in black ink, appearing to read "James Johnson".

Office of the Prothonotary

Supreme Court of New Jersey

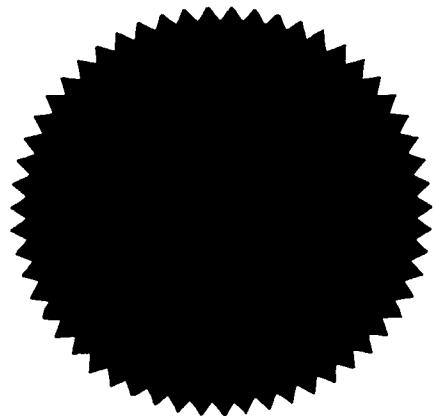


Certificate of Good Standing

This is to certify that **HEATHER MARIE EICHENBAUM**
(No. **023771996**) was constituted and appointed an Attorney at Law of New
Jersey on **December 16, 1996** and, as such,
has been admitted to practice before the Supreme Court and all other courts of this State
as an Attorney at Law, according to its laws, rules, and customs.

I further certify that as of this date, the above-named is an Attorney at Law in
Good Standing. For the purpose of this Certificate, an attorney is in "Good Standing"
if the Court's records reflect that the attorney: 1) is current with all assessments
imposed as a part of the filing of the annual Attorney Registration Statement, including,
but not limited to, all obligations to the New Jersey Lawyers' Fund for Client
Protection; 2) is not suspended or disbarred from the practice of law; 3) has not
resigned from the Bar of this State; and 4) has not been transferred to Disability
Inactive status pursuant to Rule 1:20-12.

*Please note that this Certificate does not constitute confirmation of an attorney's
satisfaction of the administrative requirements of Rule 1:21-1(a) for eligibility to
practice law in this State.*



In testimony whereof, I have
hereunto set my hand and
affixed the Seal of the
Supreme Court, at Trenton, this
11TH day of July , 20 08

A handwritten signature in black ink, appearing to read "Heather Marie Eichenbaum".
Clerk of the Supreme Court

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

DREAMLAND AMUSEMENTS, INC.,
TOY CIRCUS , INC., CROSSROADS
TRUCKING CORP., ROBERT DESTEFANO,
and KATHRYN DESTEFANO,

Plaintiffs,

v.

THE HONORABLE ANDREW M. CUOMO,
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Defendant.

Case No. 08 CIV 6321 (JGK)
ECF Case

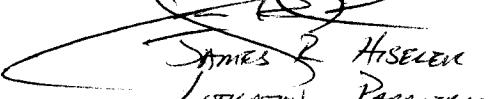
AFFIRMATION OF SERVICE

I, Heather M. Eichenbaum, Esquire, declare under penalty of perjury, that I have served a copy of the attached Motion for *Pro Hac Vice* Admission of Heather M. Eichenbaum, Esquire upon Andrew Elmore, Esquire, Assistant Attorney General, State of New York, Office of the Attorney General, 120 Broadway, New York City, NY 10271, by Federal Express on July 16, 2008, for delivery July 17, 2008, the date of filing with the Court.

Dated: July 16, 2008


HEATHER M. EICHENBAUM, ESQUIRE
SPECTOR GADON & ROSEN, P.C.

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(215) 241-8856 / (215) 531-9129 [fax]


James R. Hiscock
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